

AFFIDAVIT OF KEITH V. KONNIE



1. I, Keith V. Konnie, am an employee of the Dykema Gossett law firm.

2. I am employed as an environmental investigator and hold a private investigator's license in the State of Michigan.

3. On October 19, 1988, I contacted Gordon Stevick who lived at 11361 Crystal Lake, Bundy Hill, Michigan. Mr. Stevick owned and operated the Albion/Sheridan Township Landfill for fifteen (15) years. I made this telephone contact pursuant to direction from counsel on behalf of Hayes-Albion Corporation.

4. Mr. Stevick stated that he owned and operated the site for the 15 years it existed. He was at the site on a daily basis. He described the site as a small operation consisting of 2 or 3 acres of land. The majority of waste was municipal refuse from Parma and Sheridan Township residents. To the best of his recollection, the site was closed in 1980.

5. The operation was run out of the witnesses' home. He denied the existence of any paperwork produced during the course of business that would identify generators at the site. He repeatedly stated that this was a small operation and that he was not required to keep such paperwork.

6. Regarding the drums on the property in 1988, Mr. Stevick stated that he had no knowledge who dumped them at the

site. He stated that he did not bury them and that they are still at their original location. He does not recall any other shipments consisting of drums.

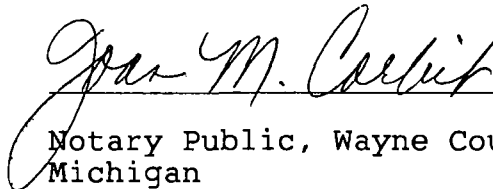
7. I have made this Affidavit on personal knowledge and could testify regarding its contents in a court of law.



Keith V. Konnie

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

The foregoing instrument was acknowledged before me this 25th day of April, 1990 by Keith V. Konnie.



Notary Public, Wayne County,
Michigan

My Commission Expires: 12-1-92

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JOAN M. CORBIT
Notary Public, Macomb County, Michigan
Acting in Wayne County
My Commission Expires December 1, 1992